



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

JUN 28 2016

Ref: 8EPR-N

Scott Armentrout, Forest Supervisor
Grand Mesa, Uncompahgre, and
Gunnison National Forests
2250 Highway 50
Delta, Colorado 81416

Re: Final Environmental Impact Statement for the Spruce Beetle Epidemic and Aspen Decline
Management Response Project; CEQ # 20160123

Dear Mr. Armentrout:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service's (USFS's) Final Environmental Impact Statement (EIS) for the Spruce Beetle Epidemic and Aspen Decline Management Response Project. The USFS Grand Mesa, Uncompahgre and Gunnison (GMUG) National Forests propose to proactively and adaptively respond to declining forest conditions that have resulted from large-scale insect and disease outbreaks by promoting recovery from the insect outbreak, improving the resiliency of green stands to future disturbances, and providing for human safety. Our review was conducted in accordance with the EPA's responsibilities under section 102 of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act (CAA).

Project Background

The project proposes to treat spruce and aspen forests impacted by the ongoing spruce beetle epidemic and sudden aspen decline (SAD), as well as areas identified as high risk across the GMUG National Forests that are located on the western slope of the Rockies and into the Colorado Plateau. The project alternatives have been further refined in the Final EIS to include the No Action Alternative (Alternative 1) as well as two action alternatives. The Final EIS revised the proposed action alternatives to only encompass temporary road construction and does not propose any permanent roads. The maximum total acres for treatment is the same for both action alternatives, with 120,000 acres proposed for treatments (60,000 of commercial treatment and 60,000 of noncommercial treatment) over an approximately 8-12 year project implementation timeframe. However, the areas where these treatments would be implemented differ by alternative. Alternative 2 is the Agency Preferred Action that incorporates an adaptive implementation approach for vegetation management activities across the landscape. Spruce stands with lower mortality would be partially harvested using uneven-aged management to increase spruce-fir resiliency. Both live green trees and pockets of dead and dying trees would be removed. In areas with higher overstory mortality, the amount of salvage harvest would increase. Aspen stands affected by SAD would be prioritized for vegetation treatments and/or prescribed fire, though selected aspen stands not currently affected would also be treated to increase resiliency. Alternative 3, Wildland Urban Interface (WUI) Focus, shifts the geographic extent of treatments exclusively to and directly outside of the WUI in areas proximal to roads and additional infrastructure to focus on public safety objectives. Alternative 4, Spruce Salvage, which was analyzed in the Draft EIS and had limited the

spruce treatments to salvage only, was not further analyzed in the Final EIS.

Comments and Closing

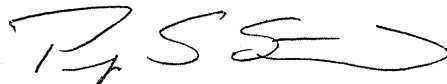
Our comments on the Draft EIS focused on whether there was sufficient information to determine impacts since site-specific treatment locations were not identified at that point in the NEPA process. Where impacts could not be predicted, we recommended that safeguards be in place such as design features, best management practices, adaptive management frameworks and monitoring protocols. We also encouraged the USFS to incorporate any potential relevant information currently available into the Final EIS to provide for a more robust analysis.

The additional data provided in the Final EIS illustrates the efforts of the USFS to address many of the EPA's and the public's concerns. The Final EIS provides more explicit details to further support the effects analysis and increases understanding of the project to better inform stakeholders about potential project impacts. Priority treatment areas (PTAs) are depicted on maps, as well as associated proposed road systems and treatment types detailing specific locations/spatial extent by each of the six Geographic Areas on the GMUG, as well as by subwatershed and/or Lynx Analysis Units. According to the Final EIS, the USFS' intent was to facilitate a more quantitative, thorough effects analysis by replacing less defined language with more specific information. By determining and disclosing more precise locations of treatment areas and related road construction, the public has a clearer understanding of how the USFS plans to avoid and/or mitigate for potential impacts. For example, the Final EIS states that a GIS analysis was conducted to determine the location of treatment areas relative to impaired streams in the project area. After it was discovered that a PTA directly intersected with the Cement Creek impaired segment, the boundary of the PTA was moved to provide a buffer between the PTA and Cement Creek.

Although Alternative 2, the Agency Preferred Action, is not without environmental impacts, the Final EIS includes details on decision-making triggers for adaptive implementation. For example, a "red light" trigger corresponds with a legal/project standard that cannot be crossed. A "yellow light" trigger indicates that a resource is being affected negatively, signaling the need for increased mitigation of effects, a change in management approach, or slowing of the pace of implementation. Including information on how the USFS will apply differing levels of triggers over the life of the project is helpful for stakeholders to better understand the desired environmental conditions and assures that protective measures are in place for these valuable resources.

We appreciate the opportunity to review the Final EIS. Thank you for considering our previous input. If you have any questions during this stage of your planning process, please contact Melanie Wasco of my staff at (303) 312-6540. Alternatively, I can be reached at (303) 312-6704.

Sincerely,

A handwritten signature in black ink, appearing to read "P. S. Strobel", with a stylized flourish at the end.

Philip S. Strobel
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation